

CIVIL COMPLAINT FORM TO BE USED BY A *PRO SE* PRISONERIN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIAKeith Christian QD7754

Full Name of Plaintiff

Inmate Number

v.

Civil No. 4:23-cv-1012

(to be filled in by the Clerk's Office)

MT Japonek

☐ Demand for Jury Trial☐ No Jury Trial Demand

Name of Defendant 1

Mathew Plummer

Name of Defendant 2

Andrew Christ

Name of Defendant 3

Christopher Moser

Name of Defendant 4

Sebek Swope

Name of Defendant 5

(Print the names of all defendants. If the names of all defendants do not fit in this space, you may attach additional pages. Do not include addresses in this section).

FILED  
SCRANTON

JUN 21 2023

Per [Signature]  
DEPUTY CLERK

## I. NATURE OF COMPLAINT

Indicate below the federal legal basis for your claim, if known.

☒

Civil Rights Action under 42 U.S.C. § 1983 (state, county, or municipal defendants)

☐Civil Rights Action under Bivens v. Six Unknown Federal Narcotics Agents, 403 U.S. 388 (1971) (federal defendants)☐

Negligence Action under the Federal Tort Claims Act (FTCA), 28 U.S.C. § 1346, against the United States

page 1 b.

Altoona Police Department

name of defendant 6

**II. ADDRESSES AND INFORMATION**

**A. PLAINTIFF**

Christian, Keith C.

Name (Last, First, MI)

QD7759

Inmate Number

S.C.I. CAMPHILL

Place of Confinement

P.O. Box 8837, 2500 Lisburn Rd.

Address

CAMPHILL, PA 17001

City, County, State, Zip Code

Indicate whether you are a prisoner or other confined person as follows:

- ☐ Pretrial detainee  
☐ Civilly committed detainee  
☐ Immigration detainee  
☒ Convicted and sentenced state prisoner  
☐ Convicted and sentenced federal prisoner

**B. DEFENDANT(S)**

Provide the information below for each defendant. Attach additional pages if needed.

Make sure that the defendant(s) listed below are identical to those contained in the caption. If incorrect information is provided, it could result in the delay or prevention of service of the complaint.

Defendant 1:

☒ Greg Stallman

Name (Last, First)

Police Chief

Current Job Title

Altoona Police Dept.

Current Work Address

ALtoona, PA 16601

City, County, State, Zip Code

page 2 b.

Defendant 6:

Altoona Police Department

Altoona, Pa.

Defendant 2:

Matthew Plummer  
Name (Last, First)  
Police officer  
Current Job Title  
Altoona Police Dept.  
Current Work Address  
Altoona, PA. 16601  
City, County, State, Zip Code

Defendant 3:

Andrew Christ  
Name (Last, First)  
Police officer  
Current Job Title  
Altoona Police Dept.  
Current Work Address  
Altoona, PA 16601  
City, County, State, Zip Code

Defendant 4:

Christopher Moser  
Name (Last, First)  
Police officer  
Current Job Title  
Altoona Police Dept.  
Current Work Address  
Altoona, PA 16601  
City, County, State, Zip Code

Defendant 5:

Serek Swope  
Name (Last, First)  
Police officer  
Current Job Title  
Altoona Police Dept.  
Current Work Address  
Altoona, PA 16601  
City, County, State, Zip Code

### III. STATEMENT OF FACTS

State only the facts of your claim below. Include all the facts you consider important. Attach additional pages if needed.

A. Describe where and when the events giving rise to your claim(s) arose.

Sheetz 1400 Logan Ave, Tyrone, PA - April 27, 2017  
1703hrs

B. On what date did the events giving rise to your claim(s) occur?

April 27, 2017

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what?)

The Blair Drug Task Force acting under color of State Law called me on my phone from Altoona, PA to set up a heroine purchase while I was in Tyrone, PA. Then acting under the color of state law, they brought a Confidential informant across county lines to purchase heroin from me while I was in Tyrone, PA. Acting under the color of state law they violated my fourth Amendment rights. They violated the Municipal Police Jurisdiction Act and the Intergovernmental Corporation Act. This started an ongoing investigation which led to 3 more C.I. drug sales and an conviction.

**IV. LEGAL CLAIM(S)**

You are not required to make legal argument or cite any cases or statutes. However, state what constitutional rights, statutes, or laws you believe were violated by the above actions. If you intend to assert multiple claims, number and set forth each claim in separate paragraphs. Attach additional pages if needed.

- ① My Fourth Amendment Const. Rights were violated when acting under the color of state law, Blair County drug task force left their primary jurisdiction.
- ② They violated the Municipal Police Jurisdiction Act.
- ③ They violated the Intergovernmental Corporation Act.
- ④ Acting under the color of state law, The Blair County Drug task force violated my 4<sup>th</sup> Amendment Constitution rights by going beyond their jurisdiction to start an investigation on a man not in their primary jurisdiction.

**V. INJURY**

Describe with specificity what injury, harm, or damages you suffered because of the events described above.

mental anguish, Loss of property, Loss of relationships, Loss wages, Loss of financial opportunities, Emotional distress, Loss of liberties of a U.S.A. Citizen.

**VI. RELIEF**

State exactly what you want the court to do for you. For example, you may be seeking money damages, you may want the court to order a defendant to do something or stop doing something, or you may be seeking both types of relief. If you are seeking monetary relief, state your request generally. Do not request a specific amount of money.

I am seeking money damages, monetary relief, I am seeking a public apology on the news like how I was when arrested.

**VII. SIGNATURE**

By signing this complaint, you represent to the court that the facts alleged are true to the best of your knowledge and are supported by evidence, that those facts show a violation of law, and that you are not filing this complaint to harass another person or for any other improper purpose.

Local Rule of Court 83.18 requires *pro se* plaintiffs to keep the court informed of their current address. If your address changes while your lawsuit is being litigated, you must immediately inform the court of the change in writing. By signing and submitting the complaint form, you agree to provide the Clerk's Office with any changes to your address where case-related papers may be served, and you acknowledge that your failure to keep a current address on file with the Clerk's Office may result in dismissal of your case.

Mr. Keith Christian

Signature of Plaintiff

January, 2, 2023

Date



Keith Christian - Qd7754  
P.O. Box 8837  
300 Lisburn Rd.  
Ampt Hill, PA 17001

Inmate Mail  
PA DEPT. OF  
CORRECTIONS



US POSTAGE • EFTS / BOWEN  
ZIP 17011 \$ 004.85<sup>0</sup>  
02 4W  
0000375947 JUN 15 2023

RECEIVED  
SCRANTON

JUN 21 2023

PER   
DEPUTY CLERK

Clerk of Courts  
U.S. District Court  
W. J. N. Federal Bldg. + U.S. Courthouse  
235 N. Washington Ave.  
P.O. Box 1148  
Scranton, PA 18501-1148